

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

MARK CONLON,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No.: 3:22-cv-107
	§	
AARON LEE SHANNON, AMERICAN	§	
FURNITURE WAREHOUSE, CO.,	§	
MAURICIO DEL REAL OLAN, STREAM	§	
EXPRESS, INC. and KEVIN LANCE	§	
LIGON,	§	
	§	
Defendants.	§	

DEFENDANT KEVIN LANCE LIGON’S NOTICE OF REMOVAL

Introduction

1. Plaintiff is Mark Conlon; Defendants are Aaron Lee Shannon, American Furniture Warehouse, Co., Mauricio Del Real Olan, Stream Express, Inc. and Kevin Lance Ligon.

2. On August 31, 2021, Plaintiff sued Defendants for negligence in Cause No. 2020-DCV3123 in the 448th Judicial District Court, El Paso County, Texas.

3. Kevin Lance Ligon received notice of this suit through service of citation and the Plaintiff’s Original Petition on February 25, 2022. Defendant files this notice of removal within the 30-day time period required by 28 U.S.C. § 1446(b).

Basis for Removal

4. Removal is proper, pursuant to 28 U.S.C. § 1332, because there is complete diversity between the parties. Plaintiff, as alleged in Plaintiffs’ Original Petition and Second Amended Original Petition, is a Texas resident. Defendant Aaron

Lee Shannon as alleged in Plaintiff's Second Amended Original Petition, is a nonresident of Texas residing in Glendale, Arizona. Defendant American Furniture Warehouse, Co. is a foreign corporation with its principal place of business is in Englewood, Colorado. Defendant Mauricio Del Real Olan as alleged in Plaintiff's Second Amended Original Petition, is a nonresident of Texas residing in Parlier, California. Defendant "Stream Express, Inc." or "Stream Express, LLC" is a foreign entity not registered to do business in Texas with its principal place of business in California. The amount in controversy exceeds \$75,000.00, excluding interest and costs as plaintiff seeks "monetary relief over \$1,000,000.00."

5. All pleadings, process, orders, and other filings in the state court action are attached to this notice as required by 28 U.S.C. § 1446(a).

6. Venue is proper in this district under 28 U.S.C. § 1441(a) because this district and division embrace the place where the removed action has been pending.

7. Defendant will promptly file a copy of this notice of removal with the clerk of the state court where the action has been pending.

Jury Demand

8. Plaintiff demanded a jury in the state court action.

Conclusion

9. WHEREFORE, Kevin Lance Ligon, Defendant, removes this action for trial from the 448th Judicial District Court, County of El Paso, State of Texas to this Court.

Respectfully submitted,

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By: /S/ Michael G. McLean
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Certificate of Service

I hereby certify that a true and correct copy of this document was e-mailed to Rogelio Solis, rogelio@381help.com, on March 25, 2022.

/S/ Michael G. McLean
Michael G. McLean